

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO
ALL ACTIONS

Hon. Anita B. Brody

PETITION FOR APPOINTMENT OF REPRESENTATIVE CLAIMANT

I, Kimberly Shackelford, by and through my undersigned counsel, respectfully move this Court for appointment as the Representative Claimant authorized to act on behalf of Donald Shackelford, a deceased, Retired NFL Football Player, in connection with the NFL Concussion Settlement as follows:

1. I seek appointment as the Representative Claimant to act on behalf of the Retired NFL Football Player and his estate, heirs, and beneficiaries but have not been appointed to act in that capacity by a court or other official of competent jurisdiction and do not have such other proof of representative capacity that the Claims Administrator has been authorized by the Court of the Parties to accept.

2. However, the Shackelford Family Trust was established by Decedent, Donald Shackelford on December 10, 2005. Petitioner, Kimberly Shackelford was appointed as one of the trustees of the Shackelford Family Trust. See Trust attached as Exhibit A.

3. To establish my authority to act as the Representative Claimant, I submit and incorporate in this Petition the Representative Claimant Declaration and supporting documents attached as Exhibit B.

4. I have confirmed with the Claims Administrator that it has not received documents or information indicating that any other individual or entity is appointed or is seeking appointment as the Representative Claimant on behalf of the Retired NFL Football Player.

5. Accordingly, I respectfully request that the Court enter an order approving this Petition establishing Kim Shackelford as Representative Claimant for the Estate of her late husband, Donald Shackelford.

6. A proposed order accompanies this Petition.

Dated: November 13, 2017

Respectfully submitted,

By: /s/ Wendy R. Fleishman

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